

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
	§	Case No. 4:18-CR-00368
v.	§	
	§	
	§	
RONNIE MCADA, JR.	§	

**DEFENDANT RONNIE MCADA, JR.’S UNOPPOSED
MOTION TO APPROVE DOMESTIC TRAVEL**

Defendant Ronnie McAda, Jr. (“Mr. McAda”) files this Unopposed Motion to Approve Domestic Travel as follows:

1. On October 29, 2019, the Court entered its Order Setting Conditions of Release (“Conditions of Release”) placing various pretrial release restrictions on Mr. McAda. The conditions restrict Mr. McAda’s travel to the state of Texas.

2. Mr. McAda seeks leave to travel by car to Springdale, Arkansas leaving on Friday, April 14, 2023, and returning to Texas on Sunday, April 16, 2023. Mr. McAda seeks to attend his daughter’s basketball tournament in Arkansas. Should the Court grant this request, Mr. McAda will provide the address and any additional details to his Pretrial Officer, Jailene Escobedo.

3. There are sufficient grounds to grant this motion. Mr. McAda has resided in Texas for the majority of his life, with the exception of attending four years at the United States Military Academy at West Point. He now resides in Texas with his wife and three children. Mr. McAda and his family also have significant ties to the community, including his family home and his children attend school in the Sunnyvale and Dallas, Texas. Given that Mr. McAda is a United

States citizen, a lifelong Texas resident, and has strong family, community, and professional ties to Texas, there is no incentive for him to flee the jurisdiction of the Court or reason to believe that he would. Mr. McAda has already surrendered his passport pursuant to this Court's order.

4. On April 5, 2023, counsel conferred with Counsel for the government, Allan Medina, who indicated the government is unopposed to this motion.

5. On April 5, 2023, counsel conferred with Pretrial Services Officer Jailene Escobedo. Officer Escobedo advised that she is unopposed to Mr. McAda's travel request.

Accordingly, defendant Ronnie McAda, Jr. respectfully requests that the Court authorize his travel to Arkansas on April 14, 2023 and returning on April 16, 2023.

Dated: April 5, 2023

Respectfully submitted,

By: /s/ Jeff Ansley

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ATTORNEYS FOR DEFENDANT

RONNIE MCADA, JR.

CERTIFICATE OF CONFERENCE

I certify that on April 5, 2023 counsel for the Defendant conferred with counsel for the government, Allan Medina, regarding this motion. Mr. Medina advised that the government does not oppose the requested relief.

/s/ Samuel M. Deau

Samuel M. Deau

CERTIFICATE OF SERVICE

I certify that on April 5, 2023, I electronically transmitted the foregoing document to the Clerk for the U.S District Court, Southern District of Texas, using the ECF system of the Court.

/s/ Jeff Ansley

Jeffrey J. Ansley